

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
WESTERN DIVISION**

SUNRISE FARMS, INC.,

Plaintiff,

vs.

CLEAN HARBORS ENVIRONMENTAL
SERVICES, INC., KDF ENTERPRISES, LLC,
& SABRE ENERGY SERVICES, LLC.;
PRIME STAFFING, LLC; TRIDENT
ENVIRONMENTAL GROUP, LLC; TRIAD
ENERGY SERVICES, LLC; PROGRESSIVE
ENVIRONMENTAL SERVICES, INC. d/b/a
SWS ENVIRONMENTAL SERVICES;
SHELTON SERVICES, INC.; and COTTON
LOGISTICS, INC.

Defendants.

CLEAN HARBORS ENVIRONMENTAL
SERVICES, INC.,

Third-Party Plaintiff,

vs.

PRIME STAFFING, LLC, TRIDENT
ENVIRONMENTAL GROUP, LLC, TRIAD
ENERGY SERVICES, LLC, PROGRESSIVE
ENVIRONMENTAL SERVICES, INC. d/b/a
SWS ENVIRONMENTAL SERVICES,
SHELTON SERVICES, INC., and COTTON
LOGISTICS, INC.,

Third-Party Defendants.

No. 5:18-cv-04022-CJW-KEM

**MOTION FOR DISMISSAL WITH
PREJUDICE OF SABRE ENERGY
SERVICES, LLC**

SHELTON SERVICES, INC.

Third-Party Plaintiff,

vs.

CODE 3 SERVICES, LLC; DILLON
ENVIRONMENTAL SERVICES, LP; EMR,
INC.; ENHANCED ENVIRONMENTAL AND
EMERGENCY SERVICES, INC.; JER'S BIN
CLEANING; JONES BUILDERS, LLC; and
SLICK RESPONSE SERVICES, LTD.,

Third-Party Defendants.

COMES NOW Plaintiff, Sunrise Farms, Inc. ("Sunrise"), and for its Motion for Dismissal with Prejudice of Sabre Energy Services, LLC states as follows:

1. Sunrise seeks dismissal with prejudice of its claims against the following entities:
 - a. Sabre Energy Services, LLC.
2. Sunrise has obtained dismissals of all other defendants in this matter.
3. An order for the relief requested in this motion is appropriate pursuant to Federal Rule of Civil Procedure 41(a)(2).

WHEREFORE, Plaintiff respectfully requests that the Court enter an order pursuant to Federal Rule of Civil Procedure 41(a)(2) dismissing Sabre Energy Services, LLC with prejudice.

Respectfully submitted,

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By /s/ Jeffrey D. Stone
Jeffrey D. Stone

By /s/ Zachary J. Hermesen
Zachary J. Hermesen
ATTORNEYS FOR PLAINTIFF

Original filed.

Copy to all counsel via CM/ECF.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause or to each of the attorneys of record herein at their respective addresses disclosed on the pleadings on November 18, 2020.

By: ☐ U. S. Mail ☐ eMail
☐ Hand Delivered ☐ Overnight Courier
☐ Certified Mail ☒ Other: CM/ECF
☐ FAX

Signature: /s/ Zach Hermesen